

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	CASE NO: 4:20-CR-056
)	
SERENDIPITY BUSINESS)	
SOLUTIONS, LLC,)	
)	
TERRY XING ZHAO WU,)	
)	
PHOENIX FISHERIES, LLC,)	
)	
and)	
)	
MARK LEON HARRISON)	

**JOINT MOTION FOR ADDITIONAL TIME
TO FILE POST-HEARING DOCUMENTS**

The United States and Defendants Serendipity Business Solutions, LLC, Terry Wu, Phoenix Fisheries, LLC, and Mark Harrison jointly move for additional time to file post-hearing documents. In support of this request, the parties provide that they are actively involved in good-faith negotiations to resolve this matter, including all outstanding motions.

At the motions hearing on June 24, 2022, the Court granted the United States' request to file an amended redacted transcript and related brief concerning the *Bruton* Motion to Sever, docs 405, 439, 442, and 460, and Defendants Phoenix Fisheries, LLC and Mark Harrison's request to file an additional motion to dismiss based on California law. Doc. 579. The Court further ordered that the United States

and Harrison shall file their respective documents by July 8, 2022, and any responsive briefs shall be filed by July 22, 2022. *Id.*

The parties jointly respectfully request until July 22, 2022, for the United States to file its amended redacted transcript and related *Bruton* brief and for Defendants Phoenix Fisheries, LLC and Mark Harrison to file their additional motion to dismiss. If additional time is granted, the parties further request two weeks from July 22, 2022, for opposing parties to file any responsive briefs. The parties respectfully submit that this additional time will allow the parties to continue their negotiations, which may result in all outstanding motions to be withdrawn, satisfied, or otherwise resolved.

This is a complex case warranting the exclusion of time under the Speedy Trial Act. Doc. 303. The legal issues addressed in the pretrial motions are also complex. In a complex case, a court may grant a continuance for pretrial proceedings if failure to grant such a continuance would “deny counsel for the defendant or the attorney for the government the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.” 18 U.S.C. § 3161(h)(7)(B)(ii); *See Bloate v. United States*, 130 S. Ct. 1345, 1358 (2010) (noting that a finding by a district court granting an extension of time to allow additional time for pretrial motion preparation is excludable under the Speedy Trial Act).

To allow sufficient time to address the complexities in this case and to allow for good-faith negotiations the parties respectfully request that the United States and Defendants Phoenix Fisheries, LLC and Mark Harrison have until July 22, 2022 to

file their post-hearing documents and the parties have until August 5, 2022 to file any responsive briefs.

Respectfully submitted,

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<u>/s/ Harry D. Dixon , Jr.</u> Harry D. Dixon , Jr. Attorney for Defendants Phoenix Fisheries, LLC and Mark Harrison Georgia Bar Number 223375 Donnie Dixon Attorney at Law 7 E Congress Street, Suite 400 Savannah, GA 31401 912-443-4070 Email: ddixon@donniedixonlaw.com	<u>/s/ David P. York</u> David P. York Attorney for Defendants Phoenix Fisheries, LLC and Mark Harrison (YORKD2887) Coumanis & York, P.C. 2102 Main Street, P.O. Box 2627 Daphne, AL 36526 251-990-3083 Email: david@c-ylaw.com